



2	<i>Declaration of Joshua Campbell in Support of Chapter 11 Petitions and First Day Motions [Dkt. No. 10]</i>			
3	<i>Debtors' Emergency Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Obtain Post-Petition Financing, Granting Senior Postpetition Security Interests And According Superpriority Administrative Expense Status Pursuant To Sections 364(c) And 364(d) Of The Bankruptcy Code; (II) Authorizing The Use Of Cash Collateral; (III) Granting Adequate Protection; (IV) Modifying The Automatic Stay; And (V) Granting Related Relief [Dkt. No. 19] (the "<b>DIP Motion</b>")</i>			
4	<i>Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 (I) Approving Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay, (VI) Granting Related Relief, and (VII) Scheduling a Final Hearing [Dkt. No. 61]</i>			
5	<i>Appointment of Official Unsecured Creditors' Committee [Dkt. No. 69]</i>			
6	<i>Application to Employ Kane Russell Coleman Logan PC as Counsel for the Official Unsecured Creditors' Committee [Dkt. No. 80]</i>			
7	<i>Committee's forthcoming Objection to Debtors' DIP Motion [Dkt. No. ____]</i>			
8	<i>Investment Banking Services Agreement dated August 22, 2018, between Zenergy and TCA Capital International Group or TCA Global Credit Master Fund, LP ("<b>TCA Global</b>") and/or its affiliates or designates</i>			
9	<i>Securities Purchase Agreement dated December 24, 2018, between Zenergy and TCA Global</i>			
10	<i>Senior Secured, Convertible, Redeemable Debenture in the principal amount of \$1,750,000, dated December 24, 2018, between Zenergy and TCA Global</i>			
11	<i>Senior Secured, Convertible, Redeemable Debenture (Fee Debenture) in the principal amount of \$16,000, dated December 24, 2018, and maturing on December 24, 2020, between Zenergy and TCA Global</i>			
12	<i>Senior Secured, Convertible, Redeemable Debenture (Fee Debenture) in the principal amount of \$16,000, dated December 24, 2018, and maturing on June 24, 2021, between Zenergy and TCA Global</i>			

13	<i>Security Agreement</i> dated December 24, 2018, by Zenergy, as borrower, in favor of TCA Global			
14	<i>Security Agreement</i> dated December 24, 2018, by Zen Technologies, Inc., Zenergy Power & Gas, Inc., NAUP Brokerage, LLC, Zenergy Labs, LLC, Zenergy & Associates, Inc., Alex Rodriguez and Sonya M. Rodriguez, as guarantors, in favor of TCA Global			
15	<i>Guaranty Agreement</i> dated December 24, 2018, by Zen Technologies, Inc., Zenergy Power & Gas, Inc., NAUP Brokerage, LLC, Zenergy Labs, Inc., Zenergy & Associates, Inc., Alex Rodriguez and Sonya M. Rodriguez, as guarantors, in favor of TCA Global			
16	<i>Promissory Note</i> in the amount \$1,947,463.41 dated March 29, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
17	<i>Promissory Note</i> in the amount \$68,000.00 dated May 9, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
18	<i>Promissory Note</i> in the amount \$63,175.00 dated May 22, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
19	<i>Promissory Note</i> in the amount \$100,000.00 dated June 19, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
20	<i>Promissory Note</i> in the amount \$34,175.00 dated July 3, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
21	<i>Promissory Note</i> in the amount \$34,175.00 dated July 12, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
22	<i>Promissory Note</i> in the amount \$66,700.00 dated July 18, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			
23	<i>Promissory Note</i> in the amount \$75,000.00 dated October 10, 2019, between Zenergy, as borrower, and TCA Global, as lender, and <i>Security Agreement</i> related thereto			

24	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Alex Rodriguez, as pledgor, (ii) Zenergy, and (iii) TCA Global, as secured party			
25	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Zenergy, as pledgor, (ii) NAUP Brokerage LLC, and (iii) TCA Global, as secured party			
26	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Zenergy, as pledgor, (ii) Zen Technologies, Inc., and (iii) TCA Global, as secured party			
27	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Zenergy, as pledgor, (ii) Zenergy & Associates, Inc., and (iii) TCA Global, as secured party			
28	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Zenergy, as pledgor, (ii) Zenergy Labs, LLC, and (iii) TCA Global, as secured party			
29	<i>Pledge and Escrow Agreement</i> dated December 24, 2018, between (i) Zenergy, as pledgor, (ii) Zenergy Power & Gas, Inc., and (iii) TCA Global, as secured party			
30	Judgment by Confession signed on December 19, 2018, by Alex Rodriguez in favor of TCA Global			
31	Letter of Resignation dated August 25, 2019, from Alex Rodriguez to Zenergy			
32	Zenergy's Form 10-K filed with the United States Securities and Exchange Commission (the " <b>SEC</b> ") for the fiscal year ending December 31, 2018			
33	Zenergy's Form 10-Q filed with the SEC for the quarterly period ending March 31, 2019			
34	Zenergy's Form 8-K filed with the SEC on August 25, 2019			
35	Schedule 14C filed by Zenergy with the SEC on May 14, 2018 (being the same document referenced in Zenergy's Form 8-K that was filed with the SEC on August 25, 2019)			
	Any other documents, agreements, or contracts concerning referenced in any of Debtors' filings in these bankruptcy cases			
	Dockets from Debtors' bankruptcy cases			

	Any other pleadings, reports, or other documents filed in these bankruptcy cases			
	All attachments or exhibits to any of the foregoing documents			
	Any exhibits designated by any other party			
	Any impeachment or rebuttal exhibits			
	The Committee reserves the right to limit any exhibits to redacted form			

The Committee reserves the right to amend or supplement this Witness and Exhibit list at any time prior to the Hearing.

Dated: November 13, 2019

Respectfully submitted,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ Joseph M. Coleman  
Joseph M. Coleman  
State Bar No. 04566100  
S. Kyle Woodard  
State Bar No. 24102661

901 Main Street, Suite 5200  
Dallas, Texas 75202  
(214) 777-4200 (Telephone)  
(214) 777-4299 (Facsimile)  
E-mail: [jcoleman@krcl.com](mailto:jcoleman@krcl.com)  
E-mail: [kwoodard@krcl.com](mailto:kwoodard@krcl.com)

***Proposed Counsel for the Official  
Committee of Unsecured Creditors***

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2019: (a) a true and correct copy of the foregoing document was served via the Court's electronic filing system (ECF) upon all parties receiving such service in this bankruptcy case; and (b) true and correct copies of all foregoing exhibits were served upon counsel for the Debtor via email to [jhaake@foley.com](mailto:jhaake@foley.com) and [mhelt@foley.com](mailto:mhelt@foley.com) and upon counsel for TCA Global via email to [bss@slp.law](mailto:bss@slp.law).

/s/ Joseph M. Coleman  
Joseph M. Coleman